

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KENNETH LEAR,

Plaintiff,

v.

ROYAL CARIBBEAN CRUISES LTD.,
d/b/a ROYAL CARIBBEAN
INTERNATIONAL, GREGORY BROWN,
individually, ROBERT KING, individually,
and GRISEL GARCIA RODRIGUEZ,
individually

Defendants.

Case No. 1:20-cv-04660-GHW

**DECLARATION OF ROBERT KLING IN
SUPPORT OF DEFENDANTS' MOTION
TO DISMISS**

I, ROBERT KLING, declare as follows:

1. I was employed as a Casting Director for Royal Caribbean Cruises Ltd. ("RCCL") until August 2, 2020. I submit this declaration in support of Defendants' Motion to Dismiss. This declaration is based upon my personal knowledge of the facts set forth herein, unless otherwise indicated.

2. At all relevant time periods I have resided in the State of Florida.

3. The Plaintiff responded to an advertisement that was placed on the internet for a singer on one of RCCL's cruise ships.


4. As part of my duties and responsibilities as a Casting Director, I oversee Casting Assistants, including Gregory Brown.

5. Mr. Brown corresponded with Plaintiff via telephone and electronic mail in furtherance of Plaintiff's application for employment with RCCL.

6. I have never directly corresponded with Plaintiff in any manner.

7. I have never met Plaintiff in person.
8. I have never traveled to New York to meet with Plaintiff.
9. Plaintiff was provided with a contingent offer of employment pending a pre-employment physical.
10. If Plaintiff passed his pre-employment physical, he was scheduled to travel to Florida to commence his employment by engaging in rehearsal.
11. Following rehearsal Plaintiff was to fly to Alaska to board the Radiance of the Seas where he was to perform for a nine month period.
12. I declare under penalty of perjury that the foregoing is true and correct.

Executed: October 23, 2020
 Miami, Florida

DocuSigned by:

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Robert Kling

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